



**City Manager's Office**  
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March 1, 2022

Emilio Llamozas  
Environmental Engineer  
U.S. EPA Region 8  
1595 Wynkoop Street  
8ENF-W-NW  
Denver, Colorado 80202

**Sent Certified Mail and Via Email**

**RE: Response to Paragraph 89 and 90 of the Administrative Order for Compliance**

Dear Mr. Llamozas,

In accordance with Paragraph 90 of the Administrative Order for Compliance against the City of Helena, I am providing EPA the requested information/report relating to Helena's implementation of its Industrial User Inventory and Characterization Procedures. Enclosed are the inspection reports and documentation of notification to industrial users of pretreatment standards, etc. in accordance with Paragraph 89 of the Administrative Order. Please note that this submittal is being provided in good faith by the City to address EPA's concerns and does not constitute an admission of liability or wrongdoing.

**Auto B Clean**

2604 Billings Avenue, Helena

Car Detailing Operation

Inspected: 2/24/2022

No sampling occurred

Character of Pollutants: Cleaners and oil and grease from shop floor. Rate is variable.

Characterized as: Nonsignificant industrial user where sector controls are in place through the City's plumbing code.

Date of Notification of Pretreatment Standards: 2/25/2022

No permit was required

Inspection report enclosed

**Blue Collar Diesel**

785 Carter Drive, Helena

Automotive Repair Operation

Inspected: 2/24/2022

No sampling occurred

Character of Pollutants: Cleaners and oil and grease from shop floor. Rate is variable.

Characterized as: Nonsignificant industrial user where sector controls are in place through the City's plumbing code.

Date of Notification of Pretreatment Standards: 2/25/2022

No permit was required

Inspection report enclosed

**Collision Pro**

420 Dorothy Lane, Helena

Autobody Collision Repair

Inspected: 12/29/2021

No sampling occurred

Character of Pollutants: Cleaners and oil and grease from shop floor. Rate is variable.

Characterized as: Nonsignificant industrial user where sector controls are in place through the City's plumbing code.

Date of Notification of Pretreatment Standards: 1/5/2022

No permit was required

Inspection report enclosed

**Diversified Truck Leasing**

1430 Carter Drive, Helena

Truck Repair and Leasing

Inspected: 2/24/2022

No sampling occurred

Character of Pollutants: Cleaners and oil and grease from shop floor. Rate is variable.

Characterized as: Nonsignificant industrial user where sector controls are in place through the City's plumbing code.

Date of Notification of Pretreatment Standards: 2/25/2022

No permit was required

Inspection report enclosed

**Energy Laboratories**

3161 E Lyndale Avenue, Helena

Environmental Laboratory

Inspected: 12/28/2021

No sampling occurred

Character of Pollutants: Neutralized water sample waste. Disposal into POTW is 60-180 gallons a week.

Characterized as: Nonsignificant industrial user that is not significant to pretreatment.

Date of Notification of Pretreatment Standards: 1/5/2022

No permit was required

Inspection report enclosed

**Rocky Mountain Radiators**

1521 National Avenue, Helena

Automotive Repair Operation

Inspected: 12/29/2021

No sampling occurred

Character of Pollutants: Cleaners and oil and grease from shop floor. Rate is variable.

Characterized as: Nonsignificant industrial user where sector controls are in place through the City's plumbing code.

Date of Notification of Pretreatment Standards: 1/5/2022

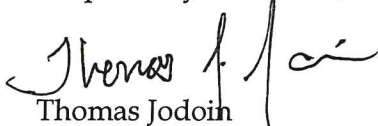
No permit was required

Inspection report enclosed

I hereby certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

Please let me know if you have any questions or require additional information.

Respectfully submitted,

  
Thomas Jodoin  
Interim City Manager

Enclosure: Industrial User Inspections and Notification of Pretreatment Standards

cc via email: Erik Coate, City Attorney  
Cathy Laughner, Browning, Kalecyc, Berry & Hoven, P.C.  
Ryan Leland/Ed Coleman, Public Works Department  
Al Garcia, EPA